



*The Commonwealth of Massachusetts*  
*Executive Office of Transportation and Construction*  
*Ten Park Plaza, Boston, MA 02116-3969*

Mitt Romney  
Governor

Kerry Healey  
Lieutenant Governor

Daniel A. Grabauskas  
Secretary of Transportation

February 14, 2005

**FILE**

Ellen Roy Herzfelder, Secretary  
Executive Office of Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114-2150

RE: Acton and Westford – The Woodlands at Laurel Hill  
(EOEA #13414)

ATTN: MEPA Unit  
Aisling Eglington

Dear Secretary Roy Herzfelder:

On behalf of the Executive Office of Transportation, I am submitting comments regarding The Woodlands at Laurel Hill in the Towns of Acton and Westford, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please call J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (617) 973-7341.

Sincerely,

A handwritten signature in dark ink, appearing to read "Astrid Glynn", with a long, sweeping horizontal line extending to the right.

Astrid Glynn  
Deputy Secretary

AG/ksm

cc: Luisa Paiewonsky, Assistant Secretary  
John Blundo, P.E., Chief Engineer  
Kenneth S. Miller, P.E., Director, Office of Transportation Planning  
Thomas Warizula, District 3 Director  
William R. Bent, P.E., State Traffic Engineer  
MBTA Commuter Rail  
Public/Private Development Unit files  
Central Massachusetts Regional Planning Commission  
Planning Board of Acton  
Planning Board of Westford  
Lowell Regional Transit Authority

COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF TRANSPORTATION  
OFFICE OF TRANSPORTATION PLANNING

MEMORANDUM

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TO: Astrid Glynn, Deputy Secretary  
Executive Office of Transportation

THROUGH: Kenneth S. Miller, P.E., Director  
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E., Manager  
Public/Private Development Unit

DATE: February 8, 2005

RE: Acton and Westford – The Woodlands at Laurel Hill  
(EOEA #13414)

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The Office of Transportation Planning has reviewed the Expanded Environmental Notification Form (ENF) for The Woodlands at Laurel Hill in Acton and Westford. According to the ENF, the proposed project consists of the construction of 437 mixed residential units of which approximately 22% are dedicated to affordable housing. The project is located on a 73.95-acre parcel northwest of Nagog Park Drive and Westford Lane and northwest of Great Road Route 2A/119. The project site was previously approved for the construction of an 115,000 square foot office building as an addition to the existing Nagog Office Park. According to information included in the ENF, the project is expected to generate 3,038 vehicle trips on an average weekday. A MassHighway permit is required for access to Route 2A/119 via Nagog Park Drive.

The project proponent has requested a waiver for the preparation of a Single EIR. The ENF included a Traffic Impact Study that conforms generally to the EOEA/EOTC Guidelines for Traffic Impact Assessments. We do not object to the preparation of a Single EIR; however, the SEIR should address the following comments.

The Single EIR should include a detailed traffic study prepared in conformance with the EOEA/EOTC Guidelines for EIR/EIS Traffic Impact Assessments and should identify appropriate mitigation measures for areas where the project will have an impact on traffic operations. The proponent should provide a clear commitment to implement these mitigation measures and should describe the timing of their implementation based on the phases of the project, if any. The Single EIR should include capacity analyses and a summary of average and 95th percentile vehicle queues for each intersection within the study area.

The SEIR should clarify the exact number of proposed housing units and the associated trip generation for the project. The ENF indicated that 437 units are proposed for a total trip generation of 3,038 average daily vehicle trips; however, the trip generation in the traffic study was derived using 352 units for a total of 2,416 daily vehicle trips. The traffic study included traffic counts at the Nagog Park site drive based of current occupancy totaling approximately 430,000 square feet. The 2009 Build conditions were estimated without taking into account full occupancy of the park. The revised traffic study should address the above issues, and present revised analysis of all the intersection within the study area. We believe that a revised traffic study will identify mitigation measures beyond the proposed traffic signal modifications and timing revisions included in the Expanded ENF.

The previously proposed Nagog Park expansion project was estimated to generate significantly fewer trips than the currently proposed project; however, the associated traffic study recommended extending the exiting approach to Great Road to facilitate access to the two southbound left-turn lanes. The project proponent should reevaluate the above recommendation, and if feasible, work closely with the proponent of the Nagog Office Park to carry its implementation. The SEIR should also include warrant analysis for unsignalized intersection locations within the study area where traffic operations are experiencing failing conditions.

The SEIR should identify a Transportation Demand Management (TDM) program that encourages bicycling, walking, and public transportation usage to reduce site trip generation. Currently, there are no existing public transportation services along the Great Road corridor in the vicinity of the site. To that end, the proponent should contact the existing Nagog Office Park and the Village at Nagog Woods residential development to identify potential for bus services, and provide the Lowell Regional Transit Authority with enough information to assess the feasibility of providing a bus route along the corridor. Should a fixed bus route not be feasible, the project proponent should consider working with the above parties to provide shuttle services to other area destinations and/or existing transit routes such as the Acton MBTA commuter rail station. The SEIR should depict a map of the proposed on site sidewalks and bicycle routes, and demonstrate how they connect to neighboring office park, residential development, and the existing Bruce Freeman bike trail in Acton. The SEIR should include specific commitment to implement any feasible improvements that will improve connections to the existing network.

We encourage the proponent to consult with the Public/Private Development Unit and the MassHighway District 3 Office during the preparation of the SEIR. If you have any questions regarding these comments, please contact me at (617) 973-7341, or Melody Thomas of the Public/Private Development Unit at (617) 973-7344.